

**City of Rochester**

Department of Law
 City Hall Room 400A, 30 Church Street
 Rochester, New York 14614-1295
www.cityofrochester.gov

Patrick Beath
 Deputy Corporation Counsel

October 11, 2023

MarkPedersen@nywd.uscourts.gov

Hon. Mark. Pedersen
 United States Magistrate Judge
 Western District of New York
 100 State Street
 Rochester, NY 14614

Re: Hall v Warren: 21-cv-6296
Case No.: 21-cv-6296

Dear Judge Pedersen,

The parties have engaged in extensive written dialogue over an ESI protocol, which is due to be filed today. Unfortunately, we have been unable to reach a final agreement despite diligent efforts by all counsel.

At this point, the parties request an extension to the ESI protocol submission date pending a conference with the court, as requested by plaintiffs' counsel at this juncture.

Given the attorneys respective schedules, we would request the conference be scheduled after October 28, 2024 as may be convenient with the court.

Respectfully submitted,

s/ Patrick B. Naylor

Patrick B. Naylor

Cc: All counsel via ECF
 & E-mail to Judge Pedersen



